

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

NOV 16 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

BELAL ABDELNABI,

Defendant.

No.

4:16CR492 RWS/JMB

INDICTMENT

COUNT I

The Grand Jury charges that:

Introduction

1. At all relevant times, the Defendant Belal Abdelnabi was an employee of Unlimited Prepay Distribution ("UPD") as a salesman based in the Chicago, Illinois area.
2. At all relevant times, UPD was engaged in the prepaid mobile telecommunications business, selling airtime and equipment for mobile telephones and smartphones and had its offices in St. Louis in the Eastern District of Missouri.
3. At all relevant times, Defendant sold UPD time and equipment and received compensation and commissions based on sales. Often, Defendant collected proceeds of his sales in cash and was expected to deposit cash receipts promptly in financial accounts of UPD.

The Scheme

4. Between on or about January 2015 and continuing through on or about July 2016, with the exact dates unknown, Defendant did devise a scheme to embezzle cash sales from UPD.

5. It was a part of the scheme that Defendant created false invoices and sales records falsely representing to UPD that sales proceeds had been deposited in the ordinary course of business or that Defendant would arrange electronic payment.
6. It was a further part of the scheme that Defendant knew UPD would rely on Defendant's false and fraudulent records and shipped things of value from the Eastern District of Missouri to the Chicago, Illinois area to Defendant's customers so that the scheme could continue.
7. It was a further part of the scheme that, from time to time, Defendant made "lulling" bulk cash shipments to UPD to address delinquent accounts for Defendant's customers.
8. In all, during the life of the scheme, Defendant embezzled and diverted more than \$360,000 in sales due and owing UPD for his own benefit.

Offense Conduct

9. On or about May 24, 2016, having devised the foregoing scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises and for the purpose of executing the same,

BELAL ABDELNABI,

the Defendant herein did use and cause to be used a commercial interstate carrier, to wit: UPS.

In violation of Title 18, United States Code Section 1341.

FORFEITURE ALLEGATION

The United States Attorney further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 1341 as set forth in Count I, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to such

violation(s).

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to such violation(s) or involved in such offense(s), or any property traceable to such offense(s).

3. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be

divided without difficulty, the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

Thomas C. Albus, #96250
Assistant United States Attorney